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Arecon Ltd

INVOICE

To: Ms. VERA FEDOROFF, Esq.
Atkinson & DeBartolo, P.C.
2 Bridge Ave #231
Red Bank, NJ 07701

INVOICE No: 16-46054-01
INVOICE DATE: JANUARY 26, 2016

PROJECT: 111 GLENDALE DRIVE, INC., JOHN'S CAR CARE CENTER –
CHAPTER 7 CASE NO. 12-26775/KCF

Summary

Progress Billing for Professional Services Provided during Period Beginning August 22, 2015 and ending January 26, 2016, Services Necessary to Avoid NJDEP Assumption of Responsibility for Remedial Action

Out of Scope Billable Hours

Date	Name	Rate	Hours	Charge	Description
08/24/15-08/31/15	Environmental Engineer LSRP/Licensed Professional Engineer	\$110.00	5	\$550.00	Various communications to NJDEP and attorneys. Report reproduction and invoice estimates.
09/2015	Environmental Engineer LSRP/Licensed Professional Engineer	\$110.00	1	\$110.00	Various communications to NJDEP and attorneys.
09/2015	Environmental Scientist	\$85.00	0.25	\$21.25	Teleconference with NJDEP.
09/2015	Environmental Technician/Drafting	\$55.00	1.25	\$68.75	Print and email Receptor Evaluation to local Township and local health department
09/2015	Administrative	\$45.00	0.75	\$33.75	Filing
10/2015	Environmental Engineer LSRP/Licensed Professional Engineer	\$110.00	6	\$660.00	Various communications to NJDEP and attorneys.
10/2015	Environmental Scientist	\$85.00	10	\$850.00	Prepare a response to the NJDEP and cost estimate prepared at request of environmental/bankruptcy attorney
11/2015	Environmental Engineer LSRP/Licensed Professional Engineer	\$110.00	17	\$1,870.00	Various communications to NJDEP regarding well placement and CEA. Teleconference with NJDEP and response to comments.
11/2015	Environmental Scientist	\$85.00	7.75	\$658.75	Review response to the NJDEP and general consulting
11/2015	Environmental Technician/Drafting	\$55.00	7	\$385.00	Drafting figures to accompany response to NJDEP, response revisions

Total Billable Out of Scope Services:

\$5,207.50

90 US Highway 130, Bordentown, New Jersey 08505
Phone 609-298-0770 Fax 609-291-8386 email ARECON-LTD @AOL.COM
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TOTAL AMOUNT \$5,207.50

DUE UPON RECEIPT

Please make check payable to:

ARECON LTD.

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Bordentown, New Jersey 08505

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INVOICE

Arecon Ltd

INVOICE No: 16-46054-03
INVOICE DATE: 03/04/2016

To: Ms. VERA FEDOROFF, Esq.

Atkinson & DeBartolo, P.C., 2 Bridge Ave #231, Red Bank, NJ 07701

PROJECT: 111 GLENDALE DRIVE, INC., JOHN'S CAR CARE CENTER - CHAPTER 7 CASE No. 12-26775/KCF

PROGRESS BILLING FOR REMEDIAL ACTIVITIES RELATED TO FILE REVIEWS AND DOCUMENTATION SUBMITTALS NECESSARY FOR THE BANKRUPTCY FILING. SPECIFIC ACTIVITIES INVOLVED PRESENTATION OF A CASE INVENTORY TO SUPPORT AND JUSTIFY REMEDIAL ACTIVITIES PRIOR TO AN IMMEDIATELY AFTER THE BANKRUPTCY. THE ACTIVITIES ALSO INCLUDED EVALUATION OF ACTIVITIES REQUIRED BY THE NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION CASE MANAGER, IMMEDIATELY PRIOR TO PASSAGE OF THE SITE REMEDIATION REFORM ACT (SRRA) PURSUANT TO THE NEW JERSEY STATUTES ANNOTATED (N.J.S.A.) 58:10-C ET SEQ., THE ADMINISTRATIVE REQUIREMENTS FOR CONTAMINATED SITES (ARRCS) PURSUANT TO THE NEW JERSEY ADMINISTRATIVE CODE (N.J.A.C.) 7:26C ET SEQ., THE TECHNICAL REQUIREMENTS AND NJDEP GUIDANCE. WORK ALSO INCLUDED ASSEMBLY OF DOCUMENTATION CONFIRMING THAT REMEDIAL ACTIVITIES WERE IN ACCORDANCE WITH RULES IN PLACE AT THE TIME REMEDIAL ACTIVITIES WERE IMPLEMENTED. THIS INVOICE REPRESENTS A FIRST SUBMITTAL OF THIS INVOICE FORMATTED AT DIRECTION OF AIG LSRP BANKRUPTCY REVIEW CONSULTANTS CHRISTOPHER C. DE CARLO, CHMM, LSRP, VERTEX COMPANIES, INC. FOR WORK COMPLETED 5-1/2 YEARS AGO. THIS CLAIM FOR SERVICES IS ALLOWABLE UNDER THE REHABILITATIVE CHAPTERS OF BANKRUPTCY, SINCE THE TRUSTEE NEED TO OBTAIN NEW CREDIT TO MANAGE THE ESTATE AND REASONABLY COULD BE CONSIDERED SUPER PRIORITY CLAIMS AGAINST THE ESTATE, WHICH ARE USUALLY PAID BEFORE ANY CLAIMS THAT AROSE BEFORE THE BANKRUPTCY. THIS SUPER PRIORITY STATUS IS CONFERRED ON POST PETITION DEBT SO THAT THE CREDITORS WILL BE MORE WILLING TO LEND MONEY TO THE BANKRUPTCY ESTATE. WORK PERFORMED PROVIDES THE OUTLINE OF A CASE INVENTORY SETTING THE FRAME WORK FOR TRUSTEE COMPLIANCE WITH PRIOR AND CONTINUING ENVIRONMENTAL LAWS. TO DATE SERVICES, PERFORMED INCLUDED ASSEMBLY OF A CASE INVENTORY PROVIDED WITH REVISED INVOICES SENT UNDER SEPARATE COVER. THESE ACTIVITIES REASONABLY SHOULD BE CONSIDERED "SUPER PRIORITY" SINCE THESE AND OTHER ENVIRONMENTAL SERVICES RENDERED BY THE LSRP HAS OBIATED THE NEED FOR THE STATE TO ASSUME CONTROL OF THE REMEDIATION POTENTIALLY TRIGGERING MUCH HIGHER COSTS AND FINANCIAL BURDENS ON THE TRUSTEE. UNDER THE "OVERSIGHT RULE" N.J.A.C. 7:26-14 ET SEQ. UNDER DIRECT OVERSIGHT, THE PERSON RESPONSIBLE FOR CONDUCTING THE REMEDIATION (THE TRUSTEE) LOSES MUCH CONTROL OVER REMEDIATION DECISION-MAKING AND INCURS AS MUCH AS TRIPLE DAMAGES AND HIGHER REMEDIATION COSTS.

Billable Hours:

Date	Name	Rate	Hours (Days/Hrs)	Charge	Description
ITEM 1 - FILE REVIEW IN CONNECTION WITH BANKRUPTCY FILINGS					
2/12/2016	Senior Engineer (BG)	\$95.00	2.0	\$190.00	Communications with Vertex response to 2/3/2016 email
2/15/2011	Senior Engineer (BG)	\$95.00	5.0	\$475.00	Case inventory, file review
2/22/2016	Senior Engineer (BG)	\$95.00	8.0	\$760.00	Case inventory, file review, preparation of Appendices A, B, C, D, A, B, C in matters relating to the above.
3/04/2016	Senior Engineer (BG)	\$95.00	2.0	\$190.00	Submittal of revised invoices and CID to Vertex in connection with the above
SUBTOTAL ITEM 1				\$1,615.00	

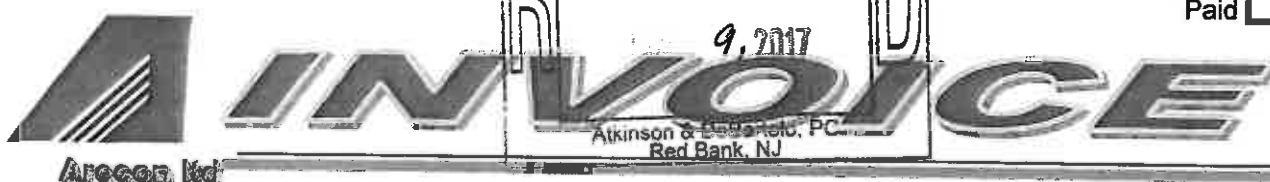
Total Billable Labor and Related Activities (Items 1, 2, 3, 4, 5, 6, 7, 8, 9 & 10) **\$1,615.00**

Copies B/W 180 pages @ \$0.25 per page **\$45.00**

Total **\$1,660.00**

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INVOICE No: 16-46054-12

INVOICE DATE: 12/30/2016

To: BUNCE ATKINSON, ESQ., TRUSTEE, 111 GLENDALE DRIVE, INC., JOHN'S CAR CARE CENTER, ATKINSON & DeBartolo, P.C., 2 Bridge Ave #231, Red Bank, NJ 07701

PROJECT: 111 GLENDALE DRIVE, INC., JOHN'S CAR CARE CENTER -CHAPTER 7 CASE No. 12-26775/KCF

PROGRESS BILLING FOR REMEDIAL ACTIVITIES RELATED TO FILE REVIEWS AND DOCUMENTATION SUBMITTALS NECESSARY FOR THE BANKRUPTCY FILING. SPECIFIC ACTIVITIES INVOLVED PRESENTATION OF A CASE INVENTORY TO SUPPORT AND JUSTIFY REMEDIAL ACTIVITIES PRIOR TO AN IMMEDIATELY AFTER THE BANKRUPTCY. THE ACTIVITIES ALSO INCLUDED EVALUATION OF ACTIVITIES REQUIRED BY THE NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION CASE MANAGER, IMMEDIATELY PRIOR TO PASSAGE OF THE SITE REMEDIATION REFORM ACT (SRRA) PURSUANT TO THE NEW JERSEY STATUTES ANNOTATED (N.J.S.A.) 58:10-C ET SEQ., THE ADMINISTRATIVE REQUIREMENTS FOR CONTAMINATED SITES (ARRCS) PURSUANT TO THE NEW JERSEY ADMINISTRATIVE CODE (N.J.A.C.) 7:26C ET SEQ., THE TECHNICAL REQUIREMENTS AND NJDEP GUIDANCE. WORK ALSO INCLUDED ASSEMBLY OF DOCUMENTATION CONFIRMING THAT REMEDIAL ACTIVITIES WERE IN ACCORDANCE WITH RULES IN PLACE AT THE TIME REMEDIAL ACTIVITIES WERE IMPLEMENTED. THIS INVOICE REPRESENTS A FIRST SUBMITTAL OF THIS INVOICE FORMATTED AT DIRECTION OF BUNCE ATKINSON, ESQ., TRUSTEE, 111 GLENDALE AND AIG LSRP BANKRUPTCY REVIEW CONSULTANTS CHRISTOPHER C DE CARLO, CHMM, LSRP, VERTEX COMPANIES, INC FOR WORK COMPLETED DURING THE PERIOD BEGINNING MARCH 14-2016 AND ENDING DECEMBER 30, 2016. THIS CLAIM FOR SERVICES IS ALLOWABLE UNDER THE REHABILITATIVE CHAPTERS OF BANKRUPTCY, SINCE THE TRUSTEE NEED TO OBTAIN NEW CREDIT TO MANAGE THE ESTATE AND REASONABLY COULD BE CONSIDERED SUPER PRIORITY CLAIMS AGAINST THE ESTATE, WHICH ARE USUALLY PAID BEFORE ANY CLAIMS THAT AROSE BEFORE THE BANKRUPTCY. THIS SUPER PRIORITY STATUS IS CONFERRED ON POST PETITION DEBT SO THAT THE CREDITORS WILL BE MORE WILLING TO LEND MONEY TO THE BANKRUPTCY ESTATE. WORK PERFORMED INCLUDED TRACING PAYMENT PROGRESS, RESPONDING TO NJDEP QUESTIONS REGARDING RI IMPLEMENTATION, ADDRESSING QUESTIONS REGARDING PRIOR INVOICES, ADDRESSING NJDEP QUESTIONS REGARDING MW-6A, MW-10, SOURCE ISSUES, THE REASONABLENESS OF PRIOR WORK PROPOSALS SENT TO AND APPROVED BY THE STATE TO ADDRESS FATE AND TRANSPORT CONCERNS & ADEQUACY OF PROPOSED MONITORED NATURAL ATTENUATION (MNA) NETWORK, LNAPL ISSUES, ETC. THE RI WORK EFFORT PREVIOUSLY SUBMITTED TO NJDEP AND PROJECT STAKEHOLDERS SET THE FRAME WORK FOR TRUSTEE COMPLIANCE WITH PRIOR AND CONTINUING ENVIRONMENTAL LAWS. WORK REFLECTED IN THIS INVOICE ALSO INCLUDED SUBMITTAL OF FINAL SCOPE OF SERVICES AND PROPOSAL TO TRUSTEE TO IMPLEMENT PROPOSED WORK PLAN TO DATE SERVICES. PERFORMED INCLUDED ASSEMBLY OF A CASE INVENTORY PROVIDED WITH REVISED INVOICES SENT UNDER SEPARATE COVER. THESE ACTIVITIES REASONABLY SHOULD BE CONSIDERED "SUPER PRIORITY" SINCE THESE AND OTHER ENVIRONMENTAL SERVICES RENDERED BY THE LSRP HAS OBIATED THE NEED FOR THE STATE TO ASSUME CONTROL OF THE REMEDIATION POTENTIALLY TRIGGERING MUCH HIGHER COSTS AND FINANCIAL BURDENS ON THE TRUSTEE PURSUANT TO THE "OVERSIGHT RULE" N.J.A.C. 7:26-14 ET SEQ. UNDER DIRECT OVERSIGHT. THE PERSON RESPONSIBLE FOR CONDUCTING THE REMEDIATION (THE TRUSTEE) LOSES MUCH CONTROL OVER REMEDIATION DECISION-MAKING AND INCURS AS MUCH AS TRIPLE DAMAGES AND HIGHER REMEDIATION COSTS.

Billable Hours:

Date	Name	Rate	Hours [Days#]	Charge	Description
ITEM 1 - PROJECT PROGRESS, COMMUNICATION RESPONDING TO QUESTIONS RAISED BY PROJECT STAKEHOLDERS DURING PERIOD BEGINNING 4-03-2016 AND ENDING 9-19-2016.					
4/03/2016	Senior Engineer (BG)	\$110.00	0.5	\$55.00	Communications with Vertex Environmental, Inc. (Vertex), the Bankruptcy Attorneys, and Trustee responding to issues regarding status of case
8/22/2016	Senior Engineer (BG)	\$110.00	0.5	\$55.00	Communications with Vertex, the Bankruptcy Attorneys, Trustee responding to issues regarding status of case
9/12/2016	Senior Engineer (BG)	\$110.00	1.0	\$110.00	Communications with Vertex, the Bankruptcy Attorneys, Trustee responding to issues regarding status of case
9/19/2016	Senior Engineer (BG)	\$110.00	2.5	\$275.00	Communications with Vertex, the Bankruptcy Attorneys, Trustee responding to issues regarding status of case, including email communications regarding question raised by Vertex and the Bankruptcy attorneys.
SUBTOTAL ITEM 1				\$495.00	

ITEM 2 – PROJECT PROGRESS, COMMUNICATION RESPONDING TO QUESTIONS RAISED BY NJDEP REGARDING PROJECT STATUS, CONCERNS ABOUT NJDEP POTENTIAL IMPLEMENTATION OF AGENCY OVERSIGHT PROVISIONS PROVIDED FOR UNDER THE “OVERSIGHT RULE” (N.J.A.C. 7:26-14 ET SEQ.), ISSUES RELATING TO FORMER WELLS MW-6A AND MW-10, POTENTIAL MOUNDING EFFECTS NEAR SOURCE AREA, AND LNAPL ISSUES. NJDEP EXPRESSED SATISFACTION WITH THE PROPOSED RI SCOPE OF WORK (SOW) ABILITY TO ADDRESS ISSUES RAISED.

9/26/2016	Senior Engineer (BG)	\$110.00	5.5	\$605.00	Responding to NJDEP queries.
9/26/2016	LSRP (PN)	\$150.00	1.0	\$150.00	LSRP consultation regarding the referenced matter.
SUBTOTAL ITEM 2				\$755.00	

ITEM 3 – PREPARATION OF SCOPE OF SERVICES ADDRESSING RI, CONFIRMATION THAT SOW ACHIEVES RECENTLY IMPLEMENTED NJDEP GUIDANCE, SUBMITTAL OF PROPOSAL TO PROJECT STAKEHOLDERS WITH SCHEDULE GOING FORWARD, INITIATE COMMUNICATIONS WITH NJDEP AND CONTINUING COMPILATIONS WITH PROJECT STAKEHOLDERS.

11/28/2016	Senior Engineer (BG)	\$110.00	1.0	\$110.00	Arecon communications with the Bankruptcy Attorneys
12/19-12/28 -2016	Senior Engineer (BG)	\$110.00	9.0	\$990.00	Scope of Work for RI development and submittal to project stakeholders.
12/19-12/28 -2016	Environmental Scientist (RS)	\$85.00	2.0	\$170.00	Review of SOW for compliance with latest NJDEP Guidance
12/19-12/28 -2016	LSRP (PN)	\$150.00	2.0	\$300.00	LSRP Review and approval
SUBTOTAL ITEM 3				\$1,570.00	

TOTAL BILLABLE LABOR AND RELATED ACTIVITIES (ITEMS 1, 2, AND 3)**\$2,820.00****TOTAL****\$2,820.00**

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